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STATE OF HAWAII
DEPARTMENT OF HEALTH
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In reply, please refer to:
EMD / SDWB

November 1, 1993

Dr. Wendy Wiltse
West Maui Watershed Management Coordinator
Lahaina Comprehensive Health Center
1830 Honoapiilani Highway
Lahaina, Maui, Hawaii 96761

Dear Dr. Wiltse:

SUBJECT: UNDERGROUND INJECTION CONTROL (UIC)
LAHAINA WASTEWATER RECLAMATION FACILITY (WWRF)

In response to your memorandum of October 8, 1993, we have listed our remarks in correlation to your numbered items. Many of your recommendations have been expressed to us by other permittees who are in a similar position to that of the Lahaina WWRF regarding the cost and effort of monitoring and reporting.

1. If EPA writes a UIC permit for Lahaina WWRF, we will be intimately involved with the development of the permit's monitoring and reporting requirements to assure that the state UIC program's discharge standards are not compromised or duplicated as an additional cost to the permittee. If two permits are issued (State and Federal), we will cooperatively manage with EPA the permit requirements so as not to duplicate efforts by the permittee and we will use, whenever appropriate, one set of analyses to serve both agencies.

2. The state UIC permit's frequencies of analyses are set at intervals of one, three, and six months depending on the type of analysis as specified in the permit: simpler analyses are done more frequently, complex analyses are done at longer time intervals. Whenever a UIC permit is issued, the issuance date (month) automatically sets the time when analyses should occur once the time intervals are counted off.

The nature of the various analyses should be fairly uniform when comparing one permit to another provided that the injection facilities are of comparable nature. If there are differences in the analytical requirements between permits from comparable facilities, those differences may have been due to developmental changes of the analytical requirements from an older permit to a more recent permit. In any case, the analytical requirements of a recent permit should represent what would be expected in any other UIC permit for a comparable facility. Changes to update older permit requirements are done usually at the time of permit renewals. The UIC program will review at any time any requests for modification of permit requirements as petitioned by the permittee.

3. As mentioned in item no. 2, the UIC program will review any petitions for a modification of permit requirements which include modifications to analytical requirements. For your information, the 6 month interval for toxicity and hazardous characteristics testing is the lowest frequency that the UIC program uses for this type of analyses. This interval of 6 months is used not only for municipal wastewater treatment plants but also for industrial facilities.

   The value of knowing with constant proof that POTW's are not discharging hazardous wastes into the environment is appreciated by all affected parties: the permittee, the regulators and, most importantly, the community. The UIC program has been able to show with real chemical analyses that the POTW's on Maui are not sources of hazardous waste discharge. This has never been shown, to our knowledge, until the UIC permits had set the foundation for the acquisition of this information. To continue in the spirit of having assurances that hazardous wastes are not being discharged into the environment, the UIC program will maintain a 6 month testing schedule as a standard interval for requiring toxicity and hazardous waste analyses.

Regarding your suggestion of collecting groundwater samples during the construction of new injection wells, under routine conditions of new well construction the UIC program requires that the applicant collect groundwater samples to characterize the quality of the ambient groundwater. This information is used to either justify the practice of injection or to establish a baseline value of the groundwater's quality. This information is most relevant for groundwater conditions prior to the start of injection operations.

As you have seen the value for collecting groundwater samples after injection practices have been long established, the UIC program also views the collection of that type of information to be important to evaluate special concerns like the effluent plume of Lahaina's injection wells or to evaluate long term effects of injection. This condition of collecting groundwater samples, notwithstanding the significant difficulties of collecting representative samples from various depths in a well, will probably be included with the approval to construct new injection well(s) if new well construction is granted.

Thank you for expressing your ideas and we hope that we have provided you with information that will help you in your job. If you have any questions about this subject, please contact me at 586-4258 (Honolulu) or call toll free from the neighbor islands at 1-800-468-4644, ext. 64258.

Sincerely,

Chauncey Hew

CHAUNCEY HEW, Geologist
Safe Drinking Water Branch
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CH:kt

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